REMARKS

Favorable reconsideration of this application is respectfully requested.

The Title is amended to be more clearly descriptive of the claimed invention.

Replacement Figures 10 and 11 are submitted herein that are now labeled as "Prior Art".

The specification is amended by the present to correct minor informalities, which are deemed to be self-evident from the originally filed disclosure. No new matter is believed to be added.

Claims 1-7 are pending in this application. Claims 4, 5, and 7 stand withdrawn from consideration as directed to a non-elected invention. Claims 1-3 and 6 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. patent application publication 2002/0036443 to Akiba et al. (herein "Akiba") in view of JP 2001-069383 to Tadao. That rejection is traversed by the present response as discussed next.

Initially, applicants note each of independent claims 1 and 6 is amended by the present response to clarify features recited therein. Specifically, independent claim 1 now recites:

> a stationary unit frame which is attached to the stationary unit attaching portions by engaging with engagement sites provided at the stationary unit attaching portions, and extended in a predetermined direction; and
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> ...
>
> wherein the flexible substrate is bent along a bending portion between the electrode region and the image pickup device, the electrode region is engaged with an engagement site provided on a side of the stationary unit frame so as to be fixed inwardly thereof, and the image pickup device region is fixed on an end surface of the stationary unit frame toward the mobile units.

Independent claim 6 is amended to recite similar features.

The above-noted claim features are believed to be fully supported for example by Figures 1, 2A-2D, and 3 in the present specification as a non-limiting example. As noted in that portion of the present specification, a stationary unit frame 11 can be attached to stationary unit attaching portions by engaging with engagement sites provided at the stationary unit attaching portions, and that extend in a predetermined direction (see for example Figures 2A and 2B). Further, in the claimed invention a flexible substrate 20 is bent along a bending portion α, β between an electrode region 50 and an image pickup device region 30, the electrode region 50 being engaged with an engagement site provided on a side of the stationary unit frame 11 so as to be fixed inwardly thereof (see for examples Figures 2C and 2D). The claimed structure allows an optical adjustment to be executed accurately at a time of a stationary unit assembly, and also allows a size of a camera unit to be reduced by reducing a number of parts.[1]

The outstanding rejection relies on Akiba to disclose a stationary unit frame as stator frame 3A, and the outstanding rejection recognizes that Akiba does not "specifically disclose a flexible substrate that includes an electrode region and an image pickup device region formed on the same surface wherein the flexible substrate is bent along a bending portion between the electrode region and the image pickup device region".[2] To overcome the recognized deficiencies in Akiba with respect to the flexible substrate the outstanding rejections cites Tadao.

Applicants traverse the above-noted grounds for rejection.

First, applicants respectfully submit neither Akiba nor Tadao disclose or suggest the features now clarified in the claims of the stationary unit frame being attached to the stationary unit attaching portions "by engaging with engagement sites provided at the stationary unit attaching portions".

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[1] See for example the discussion in the present specification at page 12, line 10 et seq. as an example.
[2] Office Action of April 4, 2007, page 4.

As noted above, the outstanding rejection indicates Akiba discloses a stationary unit frame 3A. However, applicants respectfully submit element 3A in Akiba does not attach to a stationary unit attaching portion "by engaging with engagement sites provided at the stationary unit attaching portions". Moreover, applicants respectfully submit Tadao does not disclose or suggest such a feature of a "stationary unit frame".

As noted above the outstanding rejection also cites Tadao to disclose the feature of a "flexible substrate". However, applicants respectfully submit Tadao does not disclose or suggest any flexible substrate in which an "electrode region is engaged with an engagement site provided on a side of the stationary unit so as to be fixed inwardly thereof".

The flexible substrate cited in Tadao is not even part of a stationary unit, but instead is used for arranging a printed circuit board around an already-built camera body (i.e., already around a stationary unit). Tadao also does not disclose or suggest providing any type of flexible substrate that can allow for fine positioning of different elements. Further, it is generally difficult to even perform a fine positioning with a flexible substrate because of its flexible nature.

Applicants also note the camera body disclosed in Akiba has a rigid structure that can be utilized for a fine positioning. However, utilizing the stationary unit frame of Akiba results in an increase in size for the purpose of performing positioning of a substrate in which a driving electrode group and a holding electrode group are provided. In that respect Akiba is not even related to Tadao in that Akiba discloses a rigid structure and Tadao discloses a flexible substrate. However, as noted above, clearly Tadao does not disclose or suggest any type of flexible substrate in which an electrode region "is engaged with an engagement site provided on the side of the stationary unit frame so as to be fixed inwardly thereof".

Further, applicants note in the claimed invention miniaturization can be realized by utilizing the flexible substrate in which a driving electrode group and a holding electrode

group are provided. At the same time, for performing fine positioning of such a flexible substrate the claimed invention utilizes a stationary unit frame whose position relative to the image pickup device can be defined to a high degree. By positioning the driving electrode group and the holding electrode group to predetermined positions of a stationary unit frame as in the claimed invention, and then bending and disposing the flexible substrate, a highly accurate assembly can be achieved. Only the applicants of the present invention recognized such a combination of factors resulting in such a high accurate assembly.

Applicants respectfully submit neither Akiba nor Tadao disclose or suggest the above-noted clarified claim structures in the claimed invention. Applicants thereby respectfully submit the claims as currently written patentably distinguish over Akiba in view of Tadao.

Applicants also note the presence of withdrawn claims 4 and 5 in the present application. Those claims stand withdrawn from consideration, but those claims directly or indirectly depend from independent claim 1. Thereby, independent claim 1 is clearly generic to each of claims 4 and 5. As independent claim 1 is believed to be allowable for the reasons discussed above, applicants respectfully submit claims 4 and 5 should now be reinstated. Thereby, allowance of each of claims 1-6 in the present application is believed to be proper.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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